

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION AT CLEVELAND**

IN RE:

Case No. 17-16967

Angela Dudley

Chapter 13

Debtor

Hon. Jessica E. Price Smith

**DEBTOR COUNSEL'S INITIAL APPLICATION
FOR COMPENSATION PURSUANT TO
BANKR. R. 2016 AND ADMINISTRATIVE
ORDER 07-02**

Debtor's Counsel Whitney E. Kaster, William C. Behrens, and Brian D. Flick, and the Dann Law Firm, hereby make their initial Application for Compensation pursuant to Bankruptcy Rule 2016(a), Paragraph 4 of Administrative Order 07-02 and the Order Confirmation Chapter 13 Plan (Doc. No. 32). Pursuant to Paragraph 4 of Administrative Order 07-02, Debtor's Counsel chooses to opt-out of the "no look" fee pursuant to Paragraph 3 of Administrative Order 07-02 and makes this initial application for fees for all services performed up to the point of confirmation of Debtors' Chapter 13 Plan.

In support of the Application, Debtor's Counsel hereby states the following:

- a. Legal Services Provided: All services rendered through Confirmation of Debtor's Chapter 13 Plan
- b. Result of Services: Debtor's Plan confirmed January 22, 2018.
- c. Time Spent: Attorney Time:
 - Brian D. Flick (BF) 4.30 hrs. @ \$325.00/hr. = \$1,397.50
 - Whitney Kaster (WK) 3.20 hrs. @ \$250.00/hr. = \$800.00
 - William Behrens (BB) 1.50 hours @ \$325.00/hr. = \$487.50Paralegal Time:
 - Paralegal (PP): 8.20 hrs. @ \$175.00/hr. = \$1,435.00

<u>Date</u>	<u>Service</u>	<u>Time</u>
10/27/17	Review file for docs needed	0.10 (PP)
10/27/17	Emailed client for docs needed	0.10 (PP)
11/14/17	Initial draft of petition	1.40 (PP)
11/15/17	Completed initial draft of petition	1.50 (PP)
11/15/17	Called client for missing docs	0.20 (PP)
11/16/17	Phone call with client – questions re: case	0.10 (PP)
11/21/17	Returned client's call	0.10 (PP)
11/21/17	Letter to client - directions	0.10 (PP)
11/24/17	Reviewed/edited plan and petition, prepared notice of stay, detailed email to client	1.75 (BF)
11/27/17	Updated petition based on client input	0.75 (BF)
11/27/17	Meeting with client to sign petition	1.00 (WK)
11/27/17	File petition & etc.	1.50 (PP)
11/27/17	Emailed client notice BK filing	0.10 (PP)

11/27/17	Revised plan and emailed to client	0.30 (PP)
11/27/17	Filed plan	0.10 (PP)
11/28/17	Emailed response to client	0.10 (PP)
11/28/17	Phone call with client re: childcare expenses	0.10 (PP)
12/01/17	Emailed 341 notice to client	0.10 (PP)
12/01/17	Redacted taxes, uploaded to Trustee	0.20 (PP)
12/01/17	Drafted motion mod, coversheet for amendment, pulled matrix	0.50 (PP)
12/01/17	Filed motion amend, modified plan, amended schedules	0.20 (PP)
12/04/17	341 notice to client	0.10 (PP)
12/04/17	Emailed client copy of JE staying foreclosure	0.10 (PP)
01/09/18	Prepare file for 341	0.30 (PP)
01/09/18	Review file for 341, prepare for 341	0.50 (WK)
01/10/18	Attended 341	1.50 (BB)
01/11/18	Review objection to confirmation	0.50 (BF)
01/12/18	Called client with questions re: Trustee objection	0.10 (PP)
01/22/18	Reviewed Trustee objection, detailed email to Holly	0.80 (BF)
01/23/18	Exchange emails with Trustee	0.20 (BF)
02/20/18	Reviewed file, email to WK and BM	0.30 (BF)
02/21/18	Responded to BDF, reviewed file	0.20 (PP)
02/21/18	Email proof of insurance to WF/upload to Trustee	0.10 (PP)
02/22/18	Hearing – Objection to Confirmation	1.50 (WK)
02/22/18	Emails to and from Wells Fargo	0.20 (WK)
02/23/18	Drafted wage order, emailed to BDF	0.40 (PP)
02/23/18	Upload wage order	0.10 (PP)

- d. Debtor's Counsel filed the executed Debtors' Rights and Responsibilities on November 27, 2017 (Doc. No. 6).
- e. A copy of the retainer agreement disclosing Debtor Counsel's hourly fees and the option to seek hourly fees pursuant to the administrative order is attached as Exhibit A to this Application.
- f. As disclosed in the Counsel's Application for Compensation, Debtors paid Counsel \$1,500.00 in attorney fees pre-petition. (Doc. No. 1) of which \$1,150.00 were pre-petition attorney fees, \$310.00 were paid for court costs and the remaining \$40.00 for obtaining Debtor's credit report.
- g. No previous application for services has been made for the services for which the application is made;
- h. Debtor(s)' Counsel hereby requests \$3,020.00 and has been paid \$0.00 to date by the Chapter 13 Trustee.

WHEREFORE, Debtor's Counsel requests fees in the amount of \$3,020.00.

Respectfully Submitted,

Date: February 28, 2018

/s/ Whitney E. Kaster
 Whitney E. Kaster (0091540)
 Brian Flick (0081605)
 William Behrens (0093031)

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Attorneys for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that February 28, 2018, a copy of the foregoing was filed electronically with the Clerk of the Court. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system ("ECF"). Parties may access this filing through the Court's system.

US Trustee's Office at Trustee@Usdoj.Gov

Lauren A. Helbling, Chapter 13 Trustee at ch13trustee@ch13cleve.com

Chrysostomos E. Manolis, Esq., for Creditor US Bank NA, at camnolis@logs.com

Richard John LaCivita, Esq., for Creditor Wells Fargo Bank NA, at bknotice@reimerlaw.com

AmeriCredit Financial Services, Inc., Creditor, at csbk@gmfinancial.com

PRA Receivables Management, LLC, Creditor, at claims@recoverycorp.com

And via regular US Mail, postage prepaid, to:

Debtor

All Creditors in the attached mailing matrix.

/s/ Whitney E. Kaster
Whitney E. Kaster (0091540)
Brian D. Flick (0081605)
DannLaw
Attorneys for Debtor